

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

James Wright
Plaintiff,

v.

RPS Worldwide, Inc.
Defendant.

Case No. 2:10-cv-01504-NBF

Judge: Nora Barry Fischer

**PLAINTIFF'S MOTION TO ENFORCE
SETTLEMENT AGREEMENT**

Now comes Plaintiff, James Wright, by and through counsel, and respectfully requests this Honorable Court to enforce a settlement agreement between the parties by entering a Judgment against RPS Worldwide, Inc. for the settlement amount plus attorney's fees incurred in enforcing the agreement. In support hereof, the following are attached:

1. Plaintiff's Supporting Memorandum of Law
2. Affidavit of Sid R. Klemm
3. Various Exhibits

RESPECTFULLY SUBMITTED,

Legal Helpers, P.C.

By: /s/ Jeffrey S. Hyslip
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CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2011 a copy of the foregoing Notice was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. The following parties were served through U.S. Mail on April 28, 2011.

RPS Worldwide, Inc.
c/o John W. Zielinski, Esq.
NeJame, LaFay, Jancha, Ahmed,
Barker & Joshi P.A.
189 South Orange Avenue
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Orlando, FL 32801

/s/ Jeffrey Hyslip